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January 22, 2021

VIA ECF

Honorable P. Kevin Castel
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Vance Collins, No. 19-cr-00395 (PKC)

Dear Judge Castel:

Vance Collins is scheduled to be sentenced on February 10, 2021 at 11:00 AM. Due to difficulties resulting from the COVID-19 pandemic, we respectfully request that his sentencing be adjourned for 60 days.

The recent surge in virus cases has made it extremely difficult to meet with Mr. Collins, especially given his November 17, 2020 move from Metropolitan Correctional Center to the Westchester County Department of Correction, 30 miles away. The pandemic has impeded the location and collection of necessary sentencing information and prevented our having adequate time to prepare for sentencing. Further, as noted in co-defendant Ramon Ramirez's letter seeking adjournment (ECF 139), the defense objects to many aspects of the presentence report. These objections will require additional research and briefing, particularly our objection to Probation's application of U.S.S.G § 2E1.4(a)(2) (and thereby, § 2A1.5).

The government consents to this adjournment request.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Eric R. Breslin

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Eric R. Breslin

ERB:dc
Cc: All Counsel of Record (Via ECF)